

conjunction with the IXC can.⁵⁵ Under BPP, because the billed party would dictate the IXC choice, prisoners could easily perpetuate their criminal activities, if their outside contacts select several IXCs to carry the calls. With many IXCs involved, investigators could easily be overwhelmed and become ineffective.⁵⁶ BPP supporters do not provide any indication that they realize there is a problem with inmate payphones and offer no solutions to this potential problem. Clearly, requiring that calls from inmate pay telephones be routed to the LEC and then to the OSP will lead to prison officials losing control of the call, and being unable to detect and prevent fraud and criminality.

III. CONCLUSION

In the cost-benefit analysis that the Commission must apply in this proceeding, BPP is clearly not worth its great expense. Comments filed in this rulemaking have shown that BPP will be extremely confusing for callers. BPP will force 0+ interLATA callers to speak with two operators, will cause delays, and frustrate callers with inconsistent implementation. This confusion and frustration is needless, however, as most 0+

⁵⁵ Comments of the Arizona Department of Corrections at 4.

⁵⁶ Comments of Illinois Department of Central Management Services at 2; Comments of the Arizona Department of Corrections at 5.

callers are satisfied with the present system of access code dialing and premises-owner presubscription.

BPP will also restrict competition in the 0+ market by devastating OSPs, IXC's and IPPs. The large LEC bottleneck created by BPP will allow the large LECs leverage to hold IXC's and OSPs hostage to their demands. In addition, the suspension of commissions payments to aggregators will destroy IPPs and ultimately lead to fewer payphones and substantial inconvenience for 0+ callers.

The price for caller confusion and havoc in the 0+ market will be paid by the consumer. This proposal will cost many hundreds of millions, perhaps billions of dollars just for the BOCs to implement. However, not one of the parties in this proceeding could give a definitive cost estimate for BPP. The Commission must not mandate the implementation of this proposal on the basis of pure speculation and guesswork.


Finally, BPP will severely impair the ability of correctional institutions to restrict inmate payphone fraud. Today, prison facilities can work closely with OSPs and IXC's to detect, deter and defeat illegal prisoner payphone schemes. With access to a virtually unlimited number of OSPs and IXC's, inmates will be able to perpetrate fraud, harassment, and other criminality with impunity. BPP, in short, offers no significant

benefits to consumers, but will instead undoubtedly harm the 0+
caller and the public in general.

Respectfully Submitted,

ONE CALL COMMUNICATIONS INC.

By:


Randall B. Lowe
Charles H.N. Kallenbach
JONES, DAY, REAVIS & POGUE
1450 G Street, N.W.
Washington, D.C. 20005-2088
(202) 879-3939

Its Attorneys

August 27, 1992

ATTACHMENT

The following individuals and companies have authorized the use of their name in conjunction with OPTICOM's filing on Billed Party Preference. Please incorporate into OPTICOM's comments the following:

Florida Pay Telephone Association
Lance C. Norris, President

Indiana Payphone Association
W. J. Nelson, President

South Carolina Public Communications Association
Gene Stewart, President

Georgia Public Communications Association
Jeanie Ray, President

International Payphones
Gene Stewart, Secretary

Minnesota Independent Payphone Association (MIPA)
Jim Winstead, President

Florida Public Telephone, Inc.
Jerry Mabie, President

Indiana Telecom
Troy Brosseau, Vice President

Kessler Communications Corporation
William T. Cordray, President

Pay Tel Communications, Inc.
Vincent Townsend, President

AAA COCOTS, Inc.
Gordon McMahon, Vice President/General Manager

Allied Telecommunication Systems, Inc.
William S. Reichert, President

Dynomic Communications Network, Inc.
C. Peter Dean, President

Communication Telesystems International
Edward S. Soren, President

ACT, Inc.
H. William Orr, President

Telecom America, Inc.
Larry Levine, President

Pay Phones Plus, Inc.
Chris Schmiedicke, Vice President

North Carolina Payphone Association
Vincent Townsend, President

World Communications, Inc.
Gary L. Pace, President

Independent Coin Payphone Association of Illinois
Joseph J. Amendala, President

Sheffield Systems, Inc.
Joseph J. Amendala, President

U.S. Unitel, Inc.
Robert L. Miller, Jr., President

Michigan Pay Telephone Association
Robert L. Miller, Jr., Director

Tennessee Payphone Association
Steve Anderson, Vice President

American Payphones
A. C. Thomas, President/CEO

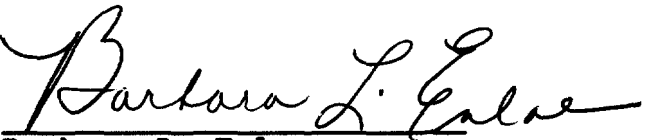
PAY COM, INC.
Danny A. Poindexter, President

Atlantic Telecom Service, Inc.
William Sarosick, CEO

Direct Communications, Inc.
Mike Campbell, President

CERTIFICATE OF SERVICE

I, Barbara L. Enloe, hereby certify that copies of the foregoing Reply Comments of One Call Communications, Inc. to the Notice of Proposed Rulemaking were served by first class mail, postage prepaid, this 27th day of August, 1992, to the persons listed on the attached Service List.


Barbara L. Enloe

August 27, 1992

SERVICE LIST

Cheryl A. Tritt, Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554

Gregory J. Vogt, Chief
Tariff Division
Federal Communications Commission
1919 M Street, N.W., Room 518
Washington, D.C. 20554

Downtown Copy Center
Federal Communications Commission
1919 M Street, N.W., Room 246
Washington, D.C. 20554

Albert H. Kramer
Robert F. Aldrich
Keck, Mahin & Cate
1201 New York Avenue, N.W.
Penthouse Suite
Washington, D.C. 20005-3919

Durward D. Dupre
Richard C. Hartgrove
Southwestern Bell Telephone Co.
1010 Pine Street, Room 2114
St. Louis, MO 63101

Patrick A. Lee
William J. Balcerski
NYNEX
120 Bloomingdale Road
White Plains, NY 10605

Catherine R. Sloan
Vice President, Federal Affairs
LDDS Communications, Inc.
1825 I Street, N.W., Suite 400
Washington, D.C. 20006

Douglas F. Brent
Advanced Telecommunications
Corporation
10000 Shelbyville Road
Louisville, KY 40223

Greg Casey
Jane A. Fisher
International Telecharge, Inc.
6707 Democracy Boulevard
Bethesda, MD 20817

Colleen Boothby, Deputy Chief
Tariff Division
Federal Communications Commission
1919 M Street, N.W., Room 518
Washington, D.C. 20554

Judy Nitsche, Chief
Tariff Review Branch
Federal Communications Commission
1919 M Street, N.W., Room 518
Washington, D.C. 20554

Policy & Program Planning Division
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 544
Washington, D.C. 20554

Floyd S. Keene
Michael S. Pabian
Ameritech Operating Companies
Room 4H76
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025

Lawrence E. Sarjeant
Randall S. Coleman
US West Communications, Inc.
1020 19th Street, N.W., Suite 700
Washington, D.C. 20036

Andrew D. Lipman
Jean L. Kiddoo
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Larry Moreland
SDN Users Association, Inc.
c/o Caterpillar, Inc.
600 W. Washington Street, AD3H
East Peoria, IL 61630

Douglas N. Owens
Northwest Pay Phone Association
4705 16th Avenue, N.E.
Seattle, WA 98105

Brad Mutschelknaus
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

William B. Barfield
Richard M. Sbaratta
BellSouth Telecommunications, Inc.
1155 Peachtree Street, N.E.
Suite 1800
Atlanta, GA 30367-6000

Alan W. Saltzman
Zero Plus Dialing, Inc.
9311 San Pedro, Suite 300
San Antonio, TX 78216

John A. Ligon
Comptel Computer Corporation
128 Mount Hebron Avenue
Post Office Box 880
Upper Montclair, NJ 07043

Richard E. Wiley
Danny E. Adams
Steven A. Augustino
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Mitchell F. Brecher
Dow, Lohnes & Albertson
1255 23rd Street, N.W.
Washington, D.C. 20037

Rick L. Anthony
Quest Communications Corporation
6600 College Boulevard, Suite 205
Overland Park, Kansas 66211

James P. Tuthill
Nancy C. Woolf
Pacific Bell/Nevada Bell
140 New Montgomery Street, Rm. 1523
San Francisco, CA 94105

Randolph J. May
David A. Gross
Sutherland, Asbill & Brennan
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2404

John M. Goodman
Bell Atlantic Telephone Companies
1710 H Street, N.W.
Washington, D.C. 20036

Joseph W. Miller
WilTel, Inc.
One Williams Center, Suite 3600
P.O. Box 2400
Tulsa, OK 74102

W. Audie Long
U.S. Long Distance, Inc.
9311 San Pedro, Suite 300
San Antonio, TX 78216

Steven E. Watkins
David Cosson
National Telephone Cooperative Assn.
2626 Pennsylvania Avenue, N.W.
Washington, D.C. 20037

Genevieve Morelli
Competitive Telecommunications
Association
1140 Connecticut Avenue, N.W.
Washington, D.C. 20036

Martin T. McCue
Linda Kent
United States Telephone Assn.
900 19th Street, N.W., Suite 800
Washington, D.C. 20006-2105

Leon M. Kestenbaum
H. Richard Juhnke
Sprint Communications Co., L.P.
1850 M Street, N.W., 11th Floor
Washington, D.C. 20036

Mary J. Sisak
Donald J. Elardo
MCI Telecommunications Corp.
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

James L. Wurtz
Pacific Bell/Nevada Bell
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Gail L. Polivy
GTE Service Corporation
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

Ellyn Elise Crutcher
Consolidated Companies
121 S. 17th Street
Mattoon, IL 61938

Judith St. Ledger-Roty
Michael R. Wack
Reed, Smith, Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036

Richard L. Goldberg
Martin A. Mattes
Graham & James
One Maritime Plaza, Suite 300
San Francisco, CA 94111

Margot Smiley Humphrey
Koteen & Naftalin
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036

Taylor F. Harper
House of Representatives
District No. 108 Mobile County
Alabama State House
Montgomery, AL 36100

Keith J. Roland
Roland, Fogel, Koblenz & Carr
One Columbia Place
Albany, NY 12207

Jerry L. McMichael
Executive Vice President,
Finance/Administration
Memphis-Shelby Intl. Airport
P.O. Box 30168
Memphis, TN 38130-0168

Krys T. Bart
Assistant Director
City of Fresno
2401 N. Ashley Way
Fresno, CA 93727

Debra L. Lagapa
Morrison & Foerster
2000 Pennsylvania Avenue, N.W.
Suite 5500
Washington, D.C. 20006

Veronica M. Ahern
Nixon, Hargrave, Devans & Doyle
One Thomas Circle, N.W., Ste. 800
Washington, D.C. 20005

Rochelle D. Jones
Director, Regulatory
Southern New England Telephone Co.
227 Church Street, 4th Floor
New Haven, CT 06510

James D. Heflinger
Vice President, General Counsel
LiTel Communications Corporation
4650 Lakehurst Court
Dublin, OH 43017

Amy S. Gross
NYCOM Information Services, Inc.
2701 Summer Street, Suite 200
Stamford, CT 06905

Perry O. Hooper, Jr.
House of Representatives
District No. 78 Montgomery County
Alabama State House
Montgomery, AL 36100

Patricia A. Weye
W.L. Gore & Associates, Inc.
1501 Barksdale Road
P.O. Box 6236
Newark, DE 19714-6336

Vernell Sturns, Executive Director
Dallas/Fort Worth Intl. Airport
East Airfield Drive, P.O. Drawer DFW
Dallas/Fort Worth Airport, TX 75261

Robert N. Broadbent, Director
Clark County, Department of Aviation
McCarren International Airport
P.O. Box 11005
Las Vegas, NV 89111

John W. Priest, Chairman & CEO
Teltronics, Inc.
2150 Whitfield Industrial Way
Sarasota, FL 34243-4046

George A. Christenberry, Jr.
Deputy Commissioner
State of Georgia
Dept. of Administrative Services
Telecommunications Division
200 Piedmont Avenue, Ste. 1402
Atlanta, GA 30334-5540

Paul C. Besozzi
Besozzi & Gavin
1901 L Street, N.W., Ste. 200
Washington, D.C. 20036

Josephine S. Trubeck
Rochester Tel Center
180 South Clinton Avenue
Rochester, NY 14646-0700

Pamela J. Brandon
Division Administrator
Wisconsin Department of Corrections
149 East Wilson Street
P.O. Box 7925
Madison, WI 53707

Stanley F. Bates
Assistant Director
Arizona Department of Corrections
1601 W. Jefferson Street
Phoenix, AZ 85007-3003

Perry R. Eichor, Secretary
S.C. Jail Administrators Assoc.
P.O. Box 10171
Greenville, SC 29603

Thomas P. Engel
Director of Airports
County of Sacramento
6900 Airport Boulevard
Sacramento, CA 95837

G.A. Barron, Jr.
President/General Manager
Portland 76 Auto/Truck Plaza Inc.
21856 Bents Road, N.E., I-5, Exit 278
Aurora, OR 97002

Louis E. Miller
Salt Lake City Airport Authority
AMF Box 22084
Salt Lake City, UT 84122

Eddie F. Storer
Natrona County International Airport
8500 Fuller Street
Casper, WY 82604-1697

James B. Dransfield
Director, Telecommunications
Duke University
Durham, NC 27706

Brian J. Kinsella
American Hotel & Motel Association
1201 New York Avenue, N.W.
Washington, D.C. 20005-3931

James R. Monk
Indiana Utility Regulatory Commn.
302 W. Washington Street, Ste. E306
Indianapolis, IN 46204

Cheryl L. Parrino, Chairman
Public Service Commn. of Wisconsin
4802 Sheboygan Avenue, P.O. Box 7854
Madison, WI 53707

Stephan G. Kraskin
2120 L Street, N.W.
Suite 300
Washington, D.C. 20037

O. Lane McCotter
Executive Director
Utah Department of Corrections
6100 South 300 East
Murray, UT 84107

Richard G. Kiebusch, President
American Jail Association
100 Day Road, Ste. 100
Hagerstown, MD 21740

Mark J. Angell
Vice President
Universal Technology &
Communications Corporation
10940 Laureate Drive, Ste. 8300
San Antonio, TX 78249-3343

Gerald K. Olson
Cheyenne Airport
P.O. Box 2210, 200 E. 8th Avenue
Cheyenne, WY 82003-2210

C.M. Armour, President
Southwest Georgia Regional Airport
3905 Newton Road
Albany, GA 31707

Patricia A. Simmons
Telecommunications Officer
Montana State University
Office of Systems and Computing
Devices
Bozeman, MT 59717-0324

Linda M. Zaina, General Counsel
OPATSCO
2000 K Street, N.W., Ste. 205
Washington, D.C. 20006

Darrell S. Townsley
Special Assistant, Attorney General
Illinois Commerce Commission
180 North LaSalle Street, Ste. 810
Chicago, IL 60601

James B. Gainer, Section Chief
Public Utilities Section
180 E. Broad Street
Columbus, OH 43266

Benjamin J. Griffin
Reed, Smith, Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036

Ronald G. Choura
Telecommunications Section
Policy Division
Michigan Public Service Commission
P.O. Box 30221
Lansing, MI 48909-7721

Alan J. Thiemann
Taylor, Theimann & Aitken
908 King Street
Suite 300
Alexandria, VA 22314

Eileen A. Huggard
Assistant Commissioner
New York City Department of
Telecommunications & Energy
75 Park Place, 6th Floor
New York, NY 10007

Francine J. Berry
Mark C. Rosenbaum
AT&T
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

Charles P. Miller
General Counsel
Value-Added Communications, Inc.
1901 S. Meyers Road, Ste. 530
Oakbrook Terrace, IL 60181

John F. Dodd
Smith, Gill, Fisher & Butts
One Kansas City Place
1200 Main Street, 35th Street
Kansas City, MO 64105-2152

Ellen M. Averett
Assistant Counsel
Pennsylvania Public Utilities Commn.
P.O. Box 3265
G-28, North Office Building
Harrisburg, PA 17105-3265

W. Dewey Clower
G. Timothy Leighton
National Association of Truck
Stop Operators
1199 North Fairfax Street, Ste. 801
Alexandria, VA 22314